# Anti-Bribery & Anti-Corruption Policy - India

## 1. Purpose

To promote ethical business conduct and ensure compliance with Indian anti-bribery and anti-corruption laws.

## 2. Scope

This policy applies to all employees, directors, consultants, contractors, vendors, and third parties associated with the company.

## 3. Definitions

- Bribery: Offering, giving, receiving, or soliciting anything of value to influence business decisions.
- Corruption: Abuse of power for personal or financial gain.

## 4. Prohibited Practices

- Offering or accepting cash, gifts, or hospitality in exchange for business favors.
- Facilitation payments (unofficial payments to speed up routine actions).
- Kickbacks or commission payments outside approved company practices.
- Political donations made on behalf of the company without approval.

## 5. Gifts & Hospitality

- Reasonable and proportionate business gifts/hospitality are allowed if they are transparent and approved.
- Any gift or hospitality exceeding INR [set limit] must be reported to HR/Compliance.

## 6. Employee Responsibilities

- Refuse and report any attempted bribery or corrupt practice.
- Maintain accurate financial and business records.
- Complete mandatory training on anti-bribery compliance.

## 7. Reporting & Whistleblowing

- Employees must report suspected bribery to the HR/Compliance Officer.
- Reports will be handled confidentially and investigated fairly.

## 8. Compliance with Laws

This policy complies with:
- Prevention of Corruption Act, 1988 (Amendment 2018)
- Indian Penal Code (Sections on fraud and corruption)
- Any applicable industry-specific anti-corruption regulations.

## 9. Non-Compliance

Employees engaging in bribery or corruption will face:
- Disciplinary action up to termination of employment
- Legal consequences under Indian law
- Liability for financial damages to the company

## 10. Review & Amendments

This policy will be reviewed annually to ensure compliance with evolving legal and ethical standards.